

KSC/07.11.23  
LNE: USAO 2023R0022

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CB  
JSDC - BALTIMORE  
'23 JUL 13 PM 3  
UNITED STATES OF AMERICA

v.

KEVIN WALLACE

Defendant.

CRIMINAL NO. JRR 23cr227

(Possession of Ammunition by a  
Prohibited Person, 18 U.S.C.  
§ 922(g)(1); Forfeiture, 18 U.S.C.  
§ 924(d), 21 U.S.C. § 853(p), 28  
U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Possession of Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about December 29, 2022, in the District of Maryland, the Defendant,

KEVIN WALLACE,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, approximately 25 rounds of 9mm ammunition, one round of .22 caliber ammunition; and the ammunition is in and affecting commerce.

18 U.S.C. § 922(g)(1)

**FORFEITURE**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction under any of the offenses charged in Count One of this Indictment.

**Firearm and Ammunition Forfeiture**

3. Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of an offense alleged in Count One, the Defendant shall forfeit to the United States any firearms and ammunition involved in such offense.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to, the following:
- a. Approximately twelve (23) 9mm cartridges of ammunition,
  - b. two rounds of 9mm ammunition,
  - c. one round of .22 caliber ammunition.

**Substitute Assets**


5. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been comingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

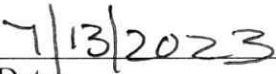
18 U.S.C. § 924(d)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Erek L. Barron  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson

  
Date